

Anti-Modern Slavery Statement

Modern Slavery

Modern slavery takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Commitment of EPAM

EPAM Systems Ltd has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act. This statement applies to all types of workers, including but not limited to permanent and fixed term workers and contractors. EPAM recognises its responsibility to have a robust approach to slavery and human trafficking.

EPAM's Business

EPAM Systems Ltd is part of the EPAM Group and our ultimate parent company is EPAM Systems Inc. which has its head office in the United States. EPAM Systems Inc. is a leading global provider of software product development and digital platform engineering solutions, with 2018 reported revenue of \$1.45B. With 25 years of experience in the information technology industry, EPAM's 25,900+ people serve our customers in over 25 countries across Europe, North America, Asia and Australia.

This statement covers the full range of our UK business activities and supply chains used by EPAM Systems Ltd across its global network. See [here](#) for a full list of operating locations.

EPAM's Actions Against Modern Slavery

EPAM complies with all laws prohibiting forced labour and slavery in our own, integral workforce. We require our Suppliers to agree to comply with our Supplier Code of Conduct, which includes among other items the following principles

EPAM is committed to uphold the human rights of workers and to treat them with dignity and respect as understood by the international community by:

Providing a workplace free from discrimination, harassment or any type of abuse.

- a. Ensuring that child labor is not used in any operations.
- b. Ensuring that all forms of forced or compulsory labor are forbidden in any operations.
- c. Provide safe working conditions for all employees and comply with all local laws with respect to wages, hours and benefits and comply with all immigration/work permissions laws.

d. Respecting the rights of workers to associate freely, join or not join labor unions, or seek representation in accordance with local laws. All personnel shall be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation, or harassment.

We undertake appropriate due diligence checks of our suppliers; we do business only with suppliers and business partners who pass those checks, uphold the principles outlined in our Code of Ethical Conduct and our Supplier Code of Conduct, and respect human rights.

EPAM operates several policies that mitigate the risk of modern slavery and set out steps to be taken to prevent slavery and human trafficking in its operations.

Whistleblowing

EPAM encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our EthicsLine.

Supplier Code of Conduct

Each Supplier of EPAM should carefully review Supplier Code of Conduct and ensure that all of Supplier's personnel and agents associated with EPAM Systems strictly comply with it in its dealings with EPAM Systems and others in the course of its relationship with EPAM Systems. Certification of Compliance must be provided to EPAM Systems, and EPAM Systems may monitor or audit for compliance from time to time. Compliance with Supplier Code of Conduct, as may be updated or amended from time to time, is mandatory for all Suppliers in our supply chain.

EPAM expect our Suppliers to adhere to the following standards, which are based on internationally recognized standards:

- 1) Compliance with all Applicable Laws, Rules, and Regulations
 - a. Anti-Bribery/Corruption Laws
 - b. Anti-Money Laundering Laws
 - c. Antitrust and Competition Laws
 - d. Securities and Insider Trading Laws
 - e. Confidential Information, Data Privacy and Intellectual Property
- 2) Labor Standards:
- 3) Environmental Laws, Regulations and Standards:
- 4) Financial Books and Records
- 5) Conflicts of Interest:
- 6) Whistle-blower Protection

Failure to comply with EPAMs Supplier Code of Conduct may result in termination as an EPAM Supplier and referral of the matter to local authorities.

2018

Recruitment and Selection

EPAM Systems, Inc. and its subsidiaries (“EPAM Systems”) uses only specified, reputable employment agencies to source labour. All entities in the EPAM ensure appropriate controls are in place to ensure employees have the right to work and are therefore protected by employment legislation. This includes checking right-to-work documents, visas and passports.

EPAM and its associated subsidiaries do not employ individuals that would be considered to be ‘child workers’.

Board approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2018, it has been approved by the board of directors of EPAM Systems Ltd, who will review it annually.



Name: Jason Peterson, on behalf of Corporate Director EPAM Systems, Inc.

Date: March 29, 2019